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9 Attorneys for Defendants  
10 The Vons Companies, Inc. and Safeway, Inc.

11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA

13 \* \* \* \* \*

14 KELLY BAUGHMAN, an individual;

15 Plaintiff,

16 vs.

17 SAFEWAY, INC. dba Vons Store 2614, a  
18 Delaware company, THE VONS  
19 COMPANIES INC. dba Vons Store 2614, a  
20 Michigan company; VONS aka Safeway, a  
21 Nevada business entity; UNKNOWN  
22 CLEANING COMPANY [ROE BUSINESS  
23 ENTITY 1], a Nevada business entity;  
24 SAFEWAY STORES INCORPORATED aka  
25 Safeway, Inc. dba Vons, an unknown business  
26 entity; DOE INDIVIDUALS 1-10 and/or  
27 ROE BUSINESS AND/OR  
28 GOVERNMENTAL ENTITIES 2-10,  
inclusive,

Defendants.

CASE NO.: 2:15-cv-01745-JCM-CWH

**STIPULATION AND ORDER TO  
REMAND CASE TO STATE COURT**

**STIPULATION AND ORDER TO REMAND CASE TO STATE COURT**

Defendants The Vons Companies, Inc. and Safeway, Inc., by and through their attorney, Tamela L. Kahle of Kahle & Associates, and Plaintiff Kelly Baughman, by and through her attorney, Neal K. Hyman, Esq. of Law Offices of Neal Hyman, do hereby stipulate to remand this matter to State Court without prejudice.

This stipulation to remand is based on Plaintiff's averment that the evidence does not show that the amount of damages exceeds \$75,000.00. The parties hereby stipulate that this matter be

1 remanded to the Eighth Judicial District Court.

2 Defendants reserve the right to Remove this matter back to Federal Court should new  
3 evidence or damages be presented that the jurisdictional limit of \$75,000 would be satisfied. Should  
4 Plaintiff's damages exceed the jurisdictional limit of \$75,000, Plaintiff will not oppose a removal to  
5 Federal Court. Plaintiff reserves the right to object to a possible removal, if through the course of  
6 discovery it is determined that Vons has a Nevada company or that a person or entity with Nevada  
7 residence should be added to the lawsuit.

8 Dated this 16<sup>th</sup> day of October, 2015.


Dated this 16<sup>th</sup> day of October, 2015.

9 LAW OFFICES OF NEAL HYMAN

KAHLE & ASSOCIATES

10  
11 /s/ Neal K. Hyman, Esq.

12 By: \_\_\_\_\_  
13 Neal K. Hyman, Esq.  
14 Nevada Bar No. 5998  
15 9480 South Eastern Avenue, Suite 260  
16 Las Vegas, Nevada 89123  
17 Attorneys for Plaintiff  
18 Kelly Baughman

19 By:   
20 Tamela L. Kahle  
21 Nevada Bar No. 0558  
22 7660 West Sahara Avenue, Suite 110  
23 Las Vegas, Nevada 89117  
24 Attorneys for Defendants  
25 The Vons Companies, Inc.  
26 and Safeway, Inc.

16 **ORDER**


17 IT IS SO ORDERED.

18 Dated October 16, 2015.

19  
20   
21 UNITED STATES DISTRICT COURT JUDGE

21 Respectfully submitted by:

22 KAHLE & ASSOCIATES

23  
24 By:   
25 Tamela L. Kahle  
26 Nevada Bar No. 0558  
27 7660 West Sahara Avenue, Suite 110  
28 Las Vegas, Nevada 89117  
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The Vons Companies, Inc.  
and Safeway, Inc.